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Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

LARAE ERNST, JENNIFER NAJERA,
AMANDA SMITH, and DANIEL
SOKOL,

Plaintiffs,

v.

COMMONSPIRIT HEALTH,

Defendant.

Case No.: 6:23-cv-00580-MK

**STIPULATION TO AWARD TO
PLAINTIFFS OF ATTORNEY FEES
INCURRED AS A RESULT OF
REMOVAL**

This stipulation comes before the Court on the order to remand this matter to state court.

On July 10, 2024, U.S. District Judge Ann Aiken adopted Judge Kasubhai's findings and recommendation without modification, and, therefore, ordered that this

matter be remanded to the Oregon Circuit Court for the County of Marion. Judge Aiken further ordered Plaintiffs to file a motion for an award of attorney fees incurred as a result of removal to be paid by Defendant.

Following remand, the parties agreed to stipulate to a reduced award of attorney fees. The parties now hereby stipulate and agree that this Court shall award attorney fees to Plaintiffs in the amount of \$15,000, and that such award shall fully resolve any claim for attorney fees or costs arising from Judge Aiken's order dated July 10, 2024.

DATED: July 24, 2024.

BENNETT HARTMAN, LLP

s/Richard Myers

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Of Attorneys for Plaintiffs

DAVIS WRIGHT TREMAINE LLP

s/Devin Smith

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DECLARATION OF SERVICE

I hereby certify I served the foregoing STIPULATION TO AWARD TO PLAINTIFFS OF ATTORNEY FEES INCURRED AS A RESULT OF REMOVAL upon the following persons:

Paula Lehmann
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Of Attorneys for Defendant

on July 24, 2024, by the following method:

X via CM/ECF

DATED: July 24, 2024.

BENNETT HARTMAN, LLP

s/Richard Myers

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Of Attorneys for Plaintiffs